A

VALE OREGON IRRIGATION DISTRICT

521 A Street West • Vale, OR 97918 • 541-473-3243
Fax: 541-473-2562 • Email: void@fmtc.com

August 16, 2007

Environmental Protection Agency
Office of ~~Pesticide~~ Programs
Regulatory Public Docket (7502P)
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

RE: COMMENTS ON ENVIRONMENTAL FATE AND ECOLOGICAL RISK ASSESSMENT FOR THE REREGISTRATION OF ACROLEIN. DOCKET ID NUMBER EPA-HQ-2007-0588

Dear Sir / Madam:

This letter offers comments on behalf of our irrigation district concerning the environmental fate and ecological risk assessment for the reregistration of Acrolein (also known as Magnacide H). Aquatic vegetation is by far the most serious pest in our irrigation district. Control of this vegetation is a costly but necessary part of the maintenance of our system. Without effective control, the farmers cannot irrigate their crops. Additionally, water, a precious natural resource, is lost to evaporation, overflow and seepage.

We use aquatic herbicides because we have to. It is the only economical way to temporarily open the canals and move water in the summer months. We have used Magnacide H herbicide in our irrigation district for over twenty five years. It is the only product that will control blue green algae and by utilizing one product, we use fewer pesticides, which keeps our costs lower. We like using a product that breaks down quickly to naturally occurring materials (carbon dioxide and water). In the over twenty five years of using Magnacide H, we have never found any dead birds or animals in or around a Magnacide application, nor has it contaminated domestic wells or affected human drinking water. Also, we irrigate nearly 35,000 acres with water treated with Magnacide and it has never caused any crop damage.

We are treating irrigation canals and water moving from canal to canal is not considered a discharge. These canals were built by, paid for and maintained for the movement of irrigation water to our growers. They are not fisheries or habitat for endangered species. In fact, we dry them up for five – six months a year.

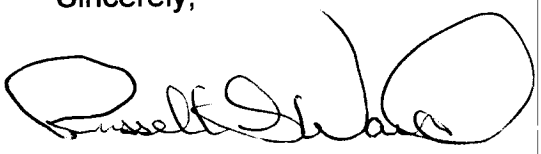
Since velocity, quantity and species of aquatic weeds, water quality, temperature and irrigation practices all play a role in how far a treatment will move, there is no realistic way one can generalize how long a treatment will be active. We do everything we can to minimize volatilization of this product when we apply. It really stinks; plus, any product that volatilizes is wasted. We don't want to waste the product because it is expensive. Nothing can stay around the vapors, including our applicators if it is not mixing well. To say that birds and wildlife could be killed by exposure to the vapors from an application is unrealistic.

All the comments about direct and indirect affects of using Magnacide H in canals would hold true for any type of aquatic weed control – chemical, mechanical or just drying up the canal.

Our district follows the label, regulations and every other law applying to the application of pesticides. Applying aquatic herbicides is not as difficult as you would make it out. We move water for a living and understand the complexities of our system. We have used Magnacide H for over twenty five years and have never had an incident of any kind. We would not be able to deliver water to our irrigators without Magnacide H.

In closing, it appears that the environmental fate and ecological risk assessment for Magnacide H is speculative, based on assumptions and without fact or science. This document could be very damaging to the agriculture community and needs to be very seriously reviewed. It is extremely important to our irrigation district to continue having Magnacide H available with no further restrictions in order to effectively control unwanted aquatic vegetation.

Sincerely,



Russell S. Ward
District Manager
Vale Oregon Irrigation District
521 A Street West
Vale, OR 97918
541-473-3243